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Attorneys for Plaintiffs
Mary P. Colvin and John Colvin

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

x _____ x
MARY P. COLVIN and JOHN COLVIN

Plaintiffs,

Civil Action No.: 07-4826 (WJM)

v.

Civil Action

VAN WORMER RESORTS, INC. and
HOTEL PUNTA COLORADA, S.A. a/k/a
PUNTA COLORADA,

Defendants.

NOTICE OF MOTION BY
PLAINTIFFS FOR
DEFAULT JUDGMENT
AGAINST DEFENDANT
HOTEL PUNTA
COLORADA, S.A.

x _____ x

TO: David R. Clark, Esq. (7112)
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Hotel Punta Colorada, S.A.
23679 Calabasas Road #769
Calabasas, CA 91302-1502

Sir:

PLEASE TAKE NOTICE that on the 5th day of May, 2008, the undersigned attorney admitted pro hac vice, counsel for the Plaintiffs Mary P. Colvin and John Colvin, shall move on behalf of said Plaintiffs before the Honorable William J. Martini, U.S.D.J. in the Federal District Court for the District for New Jersey, for an Order granting Default Judgment against Defendant Hotel Punta Colorada, S.A. based on its failure to answer or appear following service and for such other and further relief as to the Court seems just.

PLEASE TAKE FURTHER NOTICE that in support of the Plaintiffs' Motion, Plaintiffs will rely on a supporting Memorandum of Law and the affidavit of service on Hotel Punta Colorada, S.A. and the affidavit of Mary P. Colvin and the affirmation of George W. Clarke, pro hac vice attorney for plaintiffs.

Courter, Kobert & Cohen, P.C.
Attorneys for Plaintiffs

By: /s/ James F. Moscagiuri (JM-8928)
James F. Moscagiuri

Dated: April 8, 2008